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	<u>*</u>	DISTRICT COURT	
13	DISTRICT	OF NEVADA	
14			
15	JULIO CHIQUIN, an individual; JOAQUINA	CASE NO. 221 02110 IAD DIA	
	CHIQUIN, an individual; JUAN CARLOS DE PAZ-OCHOA, an individual, NINFA X.	CASE NO.: 2:21-cv-02119-JAD-DJA	
16	MAAS, an individual, NINFA X. MAAS, on		
17	behalf of her minor child, JENCARLOS DE		
18	PAZ,	STIPULATED REQUEST TO EXTEND ALL CASE DEADLINES	
	Plaintiff,	ALL CASE DEADLINES	
19	,	(Third Request)	
20	v.	ECF No. 19	
21	J.B. HUNT TRANSPORT, INC., a foreign		
22	corporation; STEPHEN R. PALACIOS, an		
	individual; DOES I-X, inclusive; and ROE CORPORATIONS I-X, inclusive,		
23	CORTORATIONS 1-A, inclusive,		
24	Defendants.		
25	On January 20, 2022, the parties notified th	is Honorable Court that they reached an agreemen	
26	for global settlement of this matter [Document 17]. Subsequently, this Court entered an Order o		
27	January 24, 2022 extending the deadline to file the opposition to the motion to remand until Marc		
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l	I .		

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21, 2022, and requiring the parties to file a stipulated dismissal by March 21, 2022 [Document 18]. Since this Court's Order, the parties have engaged in good-faith efforts to finalize the settlement and are still in the process of doing so. The parties agree that an additional 90 days is needed to complete settlement.

A few matters have contributed to the delay in finalizing settlement. As the Court is aware, this matter involves a minor plaintiff; Plaintiffs' counsel is currently determining the procedural requirements to effectuate a minor's compromise for the minor, so that a settlement may be entered into on the minor's behalf. Further, Plaintiffs' counsel is engaged in conversations with third-party insurance providers that impact the settlement agreement. The parties are diligently working on gathering the necessary information to effectuate a proper settlement agreement.

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1	Pursuant to LR IA 6-1, the parties are requesting that all pending case deadlines, including		
2	the response to the Motion to Remand filed by Plaintiffs on December 23, 2021, be extended by 90		
3	days. This is the Parties second request to extend all case deadlines, and the third request to extend		
4	time to file Defendants' Opposition to the Motion for Remand. This Stipulation is made in good faith		
5	with the intention of conserving time and resources of the parties and the Court, pending the		
6	finalization of the settlement agreement.		
7 8	Dated: March 16, 2022	Dated: March 16, 2022	
9	JENNINGS & FULTON, LTD.	MESSNER REEVES LLP	
10			
11	By:/s/ Adam R. Fulton, Esq ADAM R. FULTON, ESQ.	By: <u>/s/ Renee Finch, Esq</u> RENEE FINCH, ESQ.	
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15	Las Vegas, Nevada 89146 Telephone: (702) 979-3565	THORPE SHWER, P.C.	
16	Facsimile: (702) 362-2060	WILLIAM L. THORPE, ESQ.*	
17	Attorneys for Plaintiffs	Arizona Bar No. 005641 THOMAS D. ULREICH-POWER, ESQ.*	
18		Arizona Bar No. 019345 Attorneys for Defendants	
19		* Admitted <i>pro hac vice</i>	
20		Admitted pro nac vice	
21			
22		IT IS SO ORDERED.	
23		Mac	
24		UNITED STATES DISTRICT JUDGE	
25		3-22-22	
26		DATED	
27			

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